

Morse, Bob

From: Morse, Bob
Sent: Monday, September 23, 2019 3:55 PM
To: Randy.W.Battaglia@usace.army.mil
Cc: Moore, James T CIV USARMY CENAN (USA); Melissa.Sweet@dec.ny.gov; Pocze, Doug
Subject: FW: SEAD 25 (Fire Training and Demo Pad) draft 2019 LTM Report

Categories: EZ Record - Shared

Randy,

EPA has reviewed the SEAD 25 (Fire Training and Demo Pad) draft 2019 LTM Report.

The report recommends concluding LTM for VOCs in groundwater at SEAD-25. I will assume that concluding has the same meaning as discontinuing.

Unfortunately EPA cannot agree with this recommendation, per the emails below regarding the draft 2018 LTM Report for SEAD-25.

From review of the draft 2019 Report, it does not appear that EPA's Groundwater Completion Strategy was utilized by the Army to support the recommendation to discontinue LTM for VOCs.

Your May 20, 2019 email below states that the Army would revise the draft 2018 LTM Report to reference EPA's guidance, and would no longer propose discontinuing BTEX/VOC at SEAD-25 at that time. EPA has not received a revised 2018 LTM Report. Furthermore, the intent of EPA's May 17, 2019 email to the Army was to request that the Army actually utilize EPA's Groundwater Completion Strategy in its evaluation of the GW results, and present that evaluation directly in future LTM reports. Simply referencing EPA's guidance is not what was intended.

Please let me know if you have any questions. Thank you.

Bob

Bob Morse
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USEPA Region 2
Superfund and Emergency Management Division Federal Facilities Section
290 Broadway 18th Floor
New York, NY 10007-1866
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-----Original Message-----

From: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>
Sent: Monday, May 20, 2019 8:53 AM
To: Morse, Bob <Morse.Bob@epa.gov>
Cc: Melissa.Sweet@dec.ny.gov; Pocze, Doug <Pocze.Doug@epa.gov>; Metz, Chloe <Metz.Chloe@epa.gov>; Singh, Sharissa <Singh.Sharissa@epa.gov>; Briggs, James E CIV USARMY HQDA ACSIM (US) <james.e.briggs2.civ@mail.mil>; Roos, Allen D CIV USARMY CENAN (US) <Allen.D.Roos@usace.army.mil>; Moore, James T CIV USARMY CENAN (US) <James.T.Moore@usace.army.mil>; Mauer, Erin C CIV USARMY HQDA ACSIM (US) <erin.c.mauer.civ@mail.mil>; Pommerenck, Derek A CIV USARMY CEHNC (USA) <Derek.Pommerenck@usace.army.mil>; Heaton, Charles H Jr CIV

USARMY CEHNC (USA) <Charles.H.Heaton@usace.army.mil>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>

Subject: RE: SEAD 25 (Fire Training and Demo Pad) draft 2018 LTM Report

Bob,

Thank you for clarifying the requirements, this is significantly clearer than Julio's email last year, but that was a quick response.

For the Draft 2018 Annual Report, the Army will revise the document to reference the guidance below, and no longer propose discontinuing BTEX/VOC LTM at SEAD 25 at this time. The Army will evaluate the guidance and can address this strategy in the future Annual Reports.

The Army is not pursuing removing any LUC/ICs at Seneca, and has no plans to do so.

Some comments and clarifications-

The LTM costs for BTEX/TCE for SEAD 25 are not significant. Aside from avoiding future costs, the benefit to the Army for discontinuing monitoring is site close-out. We had proceeded with this prior to the PFAS concerns. Given the PFAS contamination, this site will certainly not be closed out in the near future.

The concept of removing LUC/ICs may be evaluated by the Army in the future, as it could decrease annual LUC inspection, Five Year Review costs, and financially close out LUC/IC sites. However, off hand, the cost of the effort to document and obtain approval to remove LUC/ICs may be more than the annual inspections and Five Year Reviews.

My primary office phone number is now: 347-213-1565

Randy Battaglia

Project Manager

Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E

-----Original Message-----

From: Morse, Bob [mailto:Morse.Bob@epa.gov]

Sent: Friday, May 17, 2019 2:07 PM

To: Battaglia, Randall W CIV USARMY CENAN (USA) <Randy.W.Battaglia@usace.army.mil>

Cc: Melissa.Sweet@dec.ny.gov; Pocze, Doug <Pocze.Doug@epa.gov>; Metz, Chloe <Metz.Chloe@epa.gov>; Singh, Sharissa <Singh.Sharissa@epa.gov>

Subject: [Non-DoD Source] FW: SEAD 25 (Fire Training and Demo Pad) draft 2018 LTM Report

Randy,

Additional clarification is needed regarding EPA's previously stated position on the above LTM Report. I apologize for this on the one hand, but on the other hand the additional research I have done will help the Army to more efficiently deal with the requested cessation of groundwater monitoring, and the eventual removal of the groundwater LUC/IC (if the Army ever wishes to do that). Subsequent to sending you the May 14, email below, I consulted with EPA management as well as legal and technical staff. Contrary to my 5/14 email, a modification to the ROD is not appropriate at this time. However, more work is required.

The ROD for SEAD-25 states that the groundwater plume shall be monitored until NYSDEC Class GA standards are achieved. The RAOs include NYSDEC standards for a number of VOCs and SVOCs. The ROD also imposes a groundwater use LUC/IC. These 2 requirements are tied together in terms of what is needed (i.e., achievement of NYSDEC Class GA groundwater standards). Furthermore, the ROD states that the soil excavation will mitigate further impacts to GW. Whether or not that has been accomplished will be more of a judgement call, one that EPA will make in the future.

To show that the RAOs (NYSDEC standards) have been achieved, EPA GW policy requires use of the Superfund Groundwater Completion Strategy. The Strategy requires a statistical analysis of the GW data. It does not appear that that analysis has been performed yet by the Army. It is also not clear that there is sufficient data to perform the required analysis. Rather than cease GW monitoring, performing the analysis will probably require the gathering of additional GW data. The Strategy also discusses conducting more frequent GW monitoring as the RAOs are close to being achieved. For the Army, this could mean a return to quarterly GW monitoring at the site. Therefore, for the Army to evaluate how it wants to proceed, the Army will have to consult the Strategy. Here is the link:

Blocked<https://www.epa.gov/superfund/superfund-groundwater-groundwater-response-completion>

Note also that at least one round of GW monitoring will most likely be required for SEAD-25's Five-Year Reviews until the site is closed out.

Last, it is up to the Army as to whether it wants to submit a revised or final 2018 LTM Report for SEAD-25. It may be more efficient to simply reply to this email regarding the Army's near-term plan for GW monitoring at the site.

Please let me know if you have any questions regarding this email.

Bob

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From: Morse, Bob

Sent: Tuesday, May 14, 2019 1:57 PM

To: Randy.W.Battaglia@usace.army.mil

Cc: Melissa.Sweet@dec.ny.gov; Pocz, Doug <Pocz.Doug@epa.gov>

Subject: SEAD 25 (Fire Training and Demo Pad) draft 2018 LTM Report

Randy,

EPA has reviewed the SEAD 25 (Fire Training and Demo Pad) draft 2018 LTM Report.

We agree with the Report's ultimate recommendation to continue sampling groundwater at the site. We also agree with the Army recommendation to prepare a modification to the ROD to address the ROD requirement for groundwater monitoring until NYSDEC Class GA standards are achieved.

Please let me know if you have any questions. Thank you.

Bob

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